

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Fairfield Sentry Limited, et al.,

Debtors in Foreign Proceedings.

Chapter 15 Case

Case No. 10-13164 (BRL)

Jointly Administered

**Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,**

Plaintiffs,

-against-

**HSBC Private Bank (Suisse) SA and
Beneficial Owners of the Accounts Held in the
Name of HSBC Private Bank (Suisse) SA 1-1000,**

Defendants.

Adv. Pro. No.10-03633 (BRL)

**Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,**

Plaintiffs,

-against-

HSBC Securities Services (Luxembourg) SA and Beneficial Owners of the Accounts Held in the Name of HSBC Securities Services (Luxembourg) SA,

Defendants.

Adv. Pro. No. 10-03630 (BRL)

Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

FS/HSBC Private Banking Nom and
Beneficial Owners of the Accounts Held in the
Name of FS/HSBC Private Banking
Nom 1-1000,

Defendants.

Adv. Pro. No. 10-03629 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Robinson & Co. and Beneficial Owners of the
Accounts Held in the Name of Robinson
& Co. 1-1000,

Defendants.

Adv. Pro. No. 10-03628 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

HSBC Private Bank (Guernsey) LTD and
Beneficial Owners of the Accounts Held in the
Name of HSBC Private Bank
(Guernsey) LTD 1-1000,

Defendants.

Adv. Pro. No. 10-03631 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Caceis Bank Luxembourg and Beneficial
Owners of the Accounts Held in the Name of
Caceis Bank Luxembourg 1-1000,

Defendants.

Adv. Pro. No. 10-03624 (BRL)

Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Citibank NA London and Beneficial Owners of
the Accounts Held in the Name of
Citibank NA London 1-1000,

Defendants.

Adv. Pro. No. 10-03622 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Citibank (Switzerland) Zurich, et al.

Defendants.

Adv. Pro. No.

Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Zurich Capital Markets Company and
Beneficial Owners of the Accounts Held in the
Name of Zurich Capital Markets
Company 1-1000 et al.,

Defendants.

Adv. Pro. No. 10-03634 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

BNP Paribas Securities Services
Luxembourg and Beneficial Owners of the
Accounts Held in the Name of BNP Paribas
Securities Services Luxembourg 1-1000,

Defendants.

Adv. Pro. No. 10-03627 (BRL)

Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

BNP Paribas Luxembourg SA and
Beneficial Owners of the Accounts Held in
the Name of BNP Paribas Luxembourg SA
1-1000,

Defendants.

Adv. Pro. No. 10-03626 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG, et al.

Defendants.

Adv. Pro. No. 10-03636 (BRL)

Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG, et al.

Defendants.

Adv. Pro. No. 10-03635 (BRL)

**MOTION OF MOVING DEFENDANTS TO WITHDRAW
THE REFERENCE OF THE ABOVE-CAPTIONED
ADVERSARY PROCEEDINGS TO THE BANKRUPTCY COURT**

TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK:

HSBC Private Bank (Suisse) SA, HSBC Securities Services
(Luxembourg) SA, HSBC Bank USA NA, HSBC Private Bank (C.I.) Limited, HSBC
Private Banking Nominee 1 (Jersey) Limited, Robinson & Co., Caceis Bank
Luxembourg, Citibank NA London, Citibank (Switzerland) AG, Citigroup, Citivic
Nominees Limited, BNP Paribas Securities Services Luxembourg, BNP Paribas
Luxembourg SA, BNP Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex Fortis, and
BNP Paribas (Suisse) SA Private, (collectively, the “Moving Defendants”), as named
defendants in the above-captioned Adversary Proceedings, respectfully moves the United
States District Court for the Southern District of New York for an entry order, pursuant to
28 U.S.C. §157(d), Federal Rules of Bankruptcy Procedure 5011, and Rule 5011-1 of the
Local Rules of Bankruptcy Court for the reasons set forth in the accompanying
memorandum of law with supporting declaration, which are hereby incorporated by
reference.

The Moving Defendants have made no prior request to this Court or to any
other court for the relief requested by this Motion.

WHEREFORE, the Moving Defendants respectfully request that the Court
enter an order granting the relief requested herein, and such other and further relief as the
Court deems just and appropriate.

Dated: New York, New York
September 20, 2010

CLEARY GOTTlieb STEEN & HAMILTON LLP

By S/ Evan A. Davis

Evan A. Davis, a Member of the Firm

*Attorneys for Defendants HSBC Private Bank
(Suisse) SA, HSBC Securities Services
(Luxembourg) SA, HSBC Bank USA NA, HSBC
Private Bank (C.I.) Limited, HSBC Private Banking
Nominee 1 (Jersey) Limited, Robinson & Co.,
Caceis Bank Luxembourg, Citibank NA London,
Citibank (Switzerland) AG, Citigroup, Citivic
Nominees Limited, BNP Paribas Securities Services
Luxembourg, BNP Paribas Luxembourg SA, BNP
Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex
Fortis, and BNP Paribas (Suisse) SA Private*